

Exhibit “B”

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

Civil Action

File No.: **1:24-cv-02911-SDG**

v.

WENDELL HOLMES, JR.,

Defendant.

AFFIDAVIT OF NATALIE SOTO

Personally appeared before the undersigned attesting officer, duly authorized to administer oaths, Natalie Soto, who having been duly sworn, on oath states and deposes as follows:

1.

I filed the instant action as plaintiff on or about July 1, 2024.

2.

As plaintiff, my cause of action against the defendant Wendell Holmes, Jr. arose out of the following circumstances.

3.

I was previously in an intimate relationship with Wendell Holmes, Jr. that I unilaterally ended on or about January 1, 2024.

4.

In approximately November of 2023, while my relationship with Wendell Holmes, Jr. was ongoing, I shared an intimate photo of myself with Mr. Holmes via text message.

5.

The photo of myself that I shared with Mr. Holmes was intended solely for the private enjoyment of Mr. Holmes and myself, and was not intended for distribution to anyone other than Mr. Holmes.

6.

As my relationship with Wendell Holmes, Jr. progressed, upon information and belief, I grew increasingly suspicious that Mr. Holmes was either married or was in an intimate relationship with one or more other women. On that basis, at the beginning of January 2024, I ended my relationship with Mr. Holmes.

7.

Prior to my relationship with Wendell Holmes, Jr., on or about January 18, 2023, I had joined a Facebook group called "Are we dating the same guy?" The members of this group, almost all women, used Facebook to communicate with other women in order to identify men who are sleeping with several women at the same time.

8.

On or about February 16, 2024, I posted a publicly accessible dating app

profile photo of Defendant Holmes in a Facebook discussion in the “Are we dating the same guy?” group, and added the following caption to my post: “If you see this man, run.”

9.

Said Facebook post identified Wendell Holmes, Jr. by his first name only and included no other identifying information, apart from advising others in the Facebook group that he was married or in a relationship while claiming on the dating app to be single.

10.

On or about February 16, 2024, after posting the above in the Facebook group, I received a private Facebook message from Mr. Holmes’ sister-in-law, who advised that she and other members of Mr. Holmes’ family were aware of his activities and intended to confront him about it.

11.

On February 22, 2024, I received a text message from an unfamiliar phone number. The message contained a screenshot of the “If you see this man, run” post I had made in the Facebook group and included no text, only the image.

12.

On February 22, 2024, I replied via text to the unfamiliar number, “Who is this?”

13.

After receiving no response to my text, on February 22, 2024, I then called the number. Although no one answered, I heard an automated voicemail message stating that I had reached the phone of Wendell Holmes, Jr.

14.

On or about Friday, February 23, 2024, I received a public Facebook comment on her personal page from a Dawn Douglas, whom I didn't know and had never communicated with before. Dawn Douglas' comment advised that she had just sent me a private Facebook message.

15.

Dawn Douglas' private message to me said Mr. Holmes had begun to harass her for making a public Facebook comment underneath my "If you see this man, run" post.

16.

Continuing to communicate with me via Facebook private-message, Ms. Douglas described to me how Mr. Holmes had recently begun sending her vulgar, harassing, and inappropriate messages on Facebook and her other social media.

17.

During this communication, Dawn Douglas provided multiple screenshots to me showing the harassing communications she had received from Mr. Holmes.

18.

One of the communications Dawn Douglas had received from Mr. Holmes that she sent me contained the intimate photo of me that I had shared with Mr. Holmes on or about November of 2023, as well as another intimate photo of an unidentified woman.

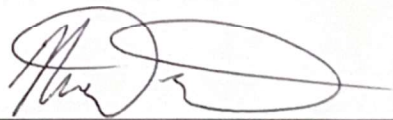
19.

By sending the above-described communication to Dawn Douglas, Wendell Holmes, Jr. used the internet and/or cellular networks to disclose to Ms. Douglas the intimate photo of myself that I had originally shared with Mr. Holmes on or about November of 2023.

20.

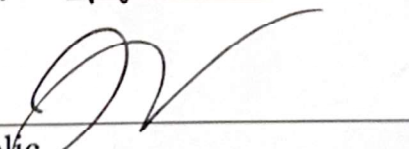
I did not consent to this disclosure by Mr. Holmes of the intimate photo of me, neither to Dawn Douglas nor to any other person.

Further affiant sayeth not.



Natalie Soto

Sworn to and subscribed before me
this 9 day of April, 2025.



Notary Public

My commission expires:

